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Before the FEDERAL COMMUNICATIONS COMMISSION Washington, D.C. 20554

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mobile services, and private-radio land-mobile services.	Because the Commission
likely will not revisit these RF exposure issues in rule	making for several years

recommendations -- one for "controlled environments" and another for "uncontrolled environments." In order to aid the Commission's interpretation and implementation of these ANSI provisions, NAB intends to provide the agency with information that we believe will be essential to the Commission's process of adopting a workable, rational and scientifically-based set of exposure guidelines for broadcasters and other FCC regulatees.

The NAB study will develop non-measurement-based techniques for determining compliance with the Commission's proposed new guidelines. These techniques would be used as a first step towards demonstrating compliance (i.e., an alternative to actual measurements) in the same manner as do the tables and charts currently contained in OST Bulletin No. 65. This research will: (1) study the impact of all parameters contained in C95.1-1992 on compliance methods described in OST Bulletin No. 65; (2) specifically determine what modifications are required for the existing charts and tables contained in the appendices of the bulletin; (3) develop any new charts or tables that may be required to demonstrate compliance with MPEs in controlled and uncontrolled environments; and (4) study the impact of the induced body current and contact current specifications contained in C95.1-1992 and develop corresponding charts, graphs or tables that can be used to easily determine compliance with the Commission's proposed guidelines.

⁵ This October 1985 bulletin, titled Evaluating Compliance with FCC-Specified Guidelines for Human Exposure to Radiofrequency Radiation, was issued in conjunction with the Commission's adoption of Report and Order in Gen. Docket No. 79144, 100 FCC 2d 543 (1985), recon. granted in part, Memorandum Opinion

NAB has contracted with Jules Cohen, P.E., of Jules Cohen and Associates,

	to carry out this research. NAB plans to submit the results of this research as part of		
	its governments in this are readed ing. It is the paragration that there comments will aims		
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the completion and full analysis of this research in the comments and replies of NAB and other interested parties.

Respectfully submitted,

NATIONAL ASSOCIATION OF BROADCASTERS 1771 N Street, N.W. Washington, D.C. 20036

Henry L. Baumann

Executive Vice President

& General Counsel

Barry D. Umansky

Deputy General Counsel

Kelly T. Williams
Manager, Television Engineering

Ted J. Bro NAB Legal Intern

July 9, 1993

CERTIFICATE OF SERVICE

I, Judith L. Gerber, do hereby certify that a true and correct copy of the foregoing "Request for Extension of Time" in ET Docket No. 93-62 was hand delivered on this date, July 9, 1993, to the following:

Thomas P. Stanley, Chief Engineer Office of Engineering and Technology Federal Communications Commission Room 7002 2025 M Street, NW Washington, DC 20554

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